

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No.: 20-10322-CLB
Chapter: 11

NOTICE OF FILING

PLEASE TAKE NOTICE that, in accordance with the Order entered July 9, 2020 [Docket No. 442] *Nunc Pro Tunc* to February 28, 2020, Connors LLP has filed the Monthly Fee Statement of Connors LLP for Compensation for Services Rendered and Reimbursement of Expenses as Special Counsel to The Diocese of Buffalo, N.Y., for the Period February 1, 2021 – February 28, 2021, a copy of which is attached hereto and hereby served upon you.

DATED: Buffalo, New York
April 19, 2021

s/ Randall D. White
Randall D. White, Esq.
CONNORS LLP
Special Counsel for Debtor
The Diocese of Buffalo, N.Y.
1000 Liberty Building
Buffalo, New York 14202
(716) 852-5533

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In Re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No.: 20-10322-CLB
Chapter: 11

MONTHLY FEE STATEMENT OF CONNORS LLP
FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO
THE DIOCESE OF BUFFALO, N.Y.
FOR THE PERIOD FEBRUARY 1, 2021 THROUGH FEBRUARY 28, 2021

Name of Applicant:	Connors LLP
Authorized to Provide Professional Services to:	The Diocese of Buffalo, N.Y., Debtor-in-Possession
Date of Retention:	Order entered July 9, 2020 [Docket No. 442] <i>Nunc Pro Tunc</i> to February 28, 2020
Period for which compensation and reimbursement is sought:	February 1, 2021 – February 28, 2021
Amount of compensation sought as actual, reasonable, and necessary:	80% of \$90,280.00 (\$72,224.00)
Amount of expense reimbursement sought as actual, reasonable, and necessary:	\$5,463.79

This is a: X monthly ___ quarterly ___ final application.

This is the _____ monthly fee statement of Connors LLP in this case.

CONNORS LLP
1000 Liberty Building
Buffalo, NY 14202
TAX ID NO. 16-1282035

April 16, 2021

DIOCESE OF BUFFALO
795 Main Street
Buffalo, NY 14203

Invoice#	35396	TMC
Our file#	002700	00006
Billing through		02/28/2021

MISCELLANEOUS MATTERS

PROFESSIONAL SERVICES

02/02/2021	LFQ	(Misc) Work on implementing instructions from Chancery representatives regarding changes to policy and procedures for Charter Case (3.1); communications regarding same (.5); review new filings of abuse claims (.5); telephone conference with Independent Diocesan Review Board Chairman regarding claim against recently deceased priest (.3); telephone conference with bankruptcy attorneys regarding same (.2); work on including new cases in batches to be sent to District Attorneys (.5); communications with Chancery regarding potential policy changes (.4).	5.50 hrs.	250 /hr	1,375.00
02/04/2021	LFQ	(Misc) Telephone conference with investigators regarding completion of investigation (.5); review file materials regarding claims of abuse and work on communications to Chancery regarding past claim of abuse (4.3).	4.80 hrs.	250 /hr	1,200.00
02/05/2021	LFQ	(Misc) Communications with Chancery regarding investigation report and sending cases to Rome (.6); work on response to inquiry regarding priest (.6); review file regarding outstanding complaint that needs to be	2.40 hrs.	250 /hr	600.00

forwarded to Independent
Diocesan Review Board and
prepare memorandum regarding
same (1.2).

02/08/2021	LFQ	(Misc) Work on responses to subpoena and proposed confidentiality order and communications with attorney regarding same. (1.1); work on memorandum regarding victim-survivor with claim against diocese (.4).	1.50 hrs.	250 /hr	375.00
02/10/2021	LFQ	(Misc) Obtain and review policies of out-of-state dioceses and study different methods for disclosure of documents.	3.80 hrs.	250 /hr	950.00
02/11/2021	LFQ	(Misc) Review allegations of anonymous complaint and communications with Chancery representative and Independent Diocesan Review Board Chairman regarding same to determine appropriate response.	1.20 hrs.	250 /hr	300.00
02/11/2021	TMC	(Misc) Receipt and review of an additional anonymous complaint against a priest of the Diocese; report to authorities and confer with Chancellery senior staff.	0.20 hrs.	250 /hr	50.00
02/12/2021	LFQ	(Misc) Work on processing complaints (1.4); telephone conference with Independent Diocesan Review Board Chairman regarding investigator (.5); communications with an attorney for Franciscan Province and review file to prepare response for same (1.2).	3.10 hrs.	250 /hr	775.00
02/13/2021	LFQ	(Misc) Communications regarding priests appearing in national media.	0.30 hrs.	250 /hr	75.00
02/16/2021	LFQ	(Misc) Telephone conference with Independent Diocesan Review Board Chairman regarding intake process (.1); telephone conference with	1.20 hrs.	250 /hr	300.00

Chancery representative about sending cases to the Congregation for the Doctrine of the Faith (.4); telephone conference with Chancery representative regarding audit (.3); review investigative report (.4).

02/17/2021	LFQ	(Misc) Communications with District Attorney's office regarding new report of abuse.	0.30 hrs.	250 /hr	75.00
02/22/2021	LFQ	(Misc) Review communications and memoranda sent by Chancery representatives regarding investigation of claim and abuse.	0.90 hrs.	250 /hr	225.00
02/23/2021	LFQ	(Misc) Work on reviewing whistleblower policy to reflect input of several Chancery representatives (.7); communications regarding changes in whistleblower policy (.3).	1.00 hrs.	250 /hr	250.00
02/26/2021	LFQ	(Misc) Work on complaint manager policy.	1.10 hrs.	250 /hr	275.00
02/27/2021	LFQ	(Misc) Telephone conference with Chancery representative regarding monitoring of priests (1.0); work on responding to request for information from Chancery representative about prior claim (.8).	1.80 hrs.	250 /hr	450.00

Total fees for this matter

\$7,275.00

BILLING SUMMARY

Connors, Terrence M.	Partner	0.20 hrs	250 /hr	50.00
Quinlan, Lawlor F. III	Partner	28.90 hrs	250 /hr	7,225.00
TOTAL FEES		29.10 hrs		\$7,275.00

DISBURSEMENTS

02/28/2021	POSTAGE	6.80
02/28/2021	COURIER SERVICE	75.00
Total disbursements for this matter		\$81.80

BILLING SUMMARY

TOTAL FEES	\$7,275.00
TOTAL DISBURSEMENTS	\$81.80
TOTAL CHARGES FOR THIS BILL	\$7,356.80

CONNORS LLP
1000 Liberty Building
Buffalo, NY 14202
TAX ID NO. 16-1282035

April 16, 2021

DIOCESE OF BUFFALO
795 Main Street
Buffalo, NY 14203
NYSAG SUBPOENA

Invoice# 35397 TMC
Our file# 002700 00040
Billing through 02/28/2021

PROFESSIONAL SERVICES

02/01/2021	TMC	Providing historical background to assist Jones, Day with respect to the negotiations with the Office of the Attorney General (1.1); confer with members of the executive team at the Diocese regarding the issues raised by the litigation and the status of the removal to the Southern District of New York (.8); confer with our team regarding the litigation deadlines and the impact of the Attorney General proposal with respect to extension of the deadlines and negotiations (.7).	2.60 hrs.	250 /hr	650.00
02/02/2021	TMC	Reviewing changes and updates in our policies and procedures to respond to inquiries by the New York State Attorney General (.8); reviewing changes and updates in our policies and procedures with respect to the Review Board after conferring with Lawlor F. Quinlan III (.4); reviewing documents to respond to the requests for production by the Attorney General (.3); confer with Lawlor F. Quinlan III regarding his effort to respond to the prayers for relief to demonstrate our compliance (1.1).	2.60 hrs.	250 /hr	650.00
02/03/2021	TMC	Preparation for and participation	3.70 hrs.	250 /hr	925.00

in call with team to respond to the requests and settlement overtures (.9); reviewing proposed revisions to policy documents, including whistleblower policy and Independent Review Board (.4); reviewing possible changes with respect to monitoring of credibly accused priests (.4); call with Jones, Day team and attorney Vacco regarding settlement discussions (.8); report to Diocese executive team (.4); follow-up call with Jones, Day and our team regarding preliminary issues raised by the Attorney General with respect to settlement and the procedural issues with the coordination of the bankruptcy matter (.8).

02/04/2021	TMC	Preparation for and participation in a conference call with the attorneys for each Diocese within the State (1.1); reviewing draft letter from the attorney for other diocese (.3); confer with our team at Jones, Day regarding the advance waiver issues (.3); conferring with the Diocese regarding recouping defense costs from insurance carriers (.2); preparing response to inquiry and copy to insurance coverage counsel (.2).	2.10 hrs.	250 /hr	525.00
02/05/2021	LFQ	Research regarding Not-for-Profit Corporation's Law issues raised by Attorney General, including provision regarding whistleblower policy (1.0); review two Diocesan policy whistleblower policies and draft proposed changes to same (1.9).	2.90 hrs.	250 /hr	725.00
02/05/2021	TMC	Conferring with our team regarding preparation for our conference with the Attorney General (.6); reviewing the key	1.20 hrs.	250 /hr	300.00

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points for discussion requested by the Attorney General (.4); report to the Diocese (.2).

02/06/2021	LFQ	Review memoranda from Terrence M. Connors regarding strategy and conversations with attorneys (.5); review memorandum regarding settlement (.8); work on possible changes to the diocesan policies(1.8).	3.10 hrs.	250 /hr	775.00
02/06/2021	TMC	Reviewing our proposed changes to respond to the issues raised by the Attorney General and preparing a summary of efforts made over the years to comply with the Charter.	0.80 hrs.	250 /hr	200.00
02/07/2021	RDW	Emails and preparation of possible discussion points.	0.50 hrs.	250 /hr	125.00
02/07/2021	TMC	Reviewing the Jones, Day declaration for factual accuracy and providing them with additional background information.	0.30 hrs.	250 /hr	75.00
02/08/2021	LFQ	Prepare memoranda regarding proposed changes to diocesan policies to respond to Attorney General's concerns (1.1); communications regarding same (.8).	1.90 hrs.	250 /hr	475.00
02/08/2021	TMC	Assisting with the updating of our policies (.4); reviewing, revising, and updating the whistleblower policies to comply with amendments to the not-for-profit corporation law (.3); email with Don Blowey regarding any updates to the safe environment policy (.1); conferring with Lawlor F. Quinlan III regarding changes to the Independent Review Board and the initial investigation (.3); working with Sr. Mary McCarrick and Sr. Regina Murphy regarding the monitoring programs and	1.90 hrs.	250 /hr	475.00

reviewing policies from other Dioceses (.3); conferring with our team regarding the issues to be discussed with the Attorney General as to settlement and email correspondence regarding same (.3); reviewing objections to the retention of Jones, Day and Lippes, Mathias (.2).

02/09/2021	TMC	Conferring with our team regarding the recent developments in litigation, including the recusal of Judge Crotty, briefing schedule, stipulations with Attorney General counsel regarding the statutory deadlines that are involved, and email correspondence regarding judicial assignment.	0.80 hrs.	250 /hr	200.00
02/10/2021	TMC	Preparation for and participation in conference call with our entire team to discuss the next steps, procedural issues, strategy, and historical information for Jones, Day.	1.10 hrs.	250 /hr	275.00
02/11/2021	TMC	Preparation for and participation in conference call with the attorney from each Diocese in the State of New York to discuss current issues with respect to the Office of Attorney General investigation/litigation (.9); email correspondence with Diocese regarding the necessary documents for production to the office of the Attorney General (.7).	1.60 hrs.	250 /hr	400.00
02/12/2021	RDW	Emails regarding recent developments, status and strategy.	0.60 hrs.	250 /hr	150.00
02/12/2021	TMC	Extensive email correspondence with our client and the team regarding coordination of a number of issues that have arisen, as well as coordination with the bankruptcy production	1.80 hrs.	250 /hr	450.00

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(.9); discussion with the Jones, Day team regarding motion schedule, settlement meeting and the historical data needed for that meeting (.9).

02/13/2021	LFQ	Work on memorandum analyzing specific priests addressed in Attorney General's complaint.	4.90 hrs.	250 /hr	1,225.00
02/13/2021	TMC	Conferring with Jones, Day regarding their need for historical information with respect to correspondence with the Office of Attorney General.	0.30 hrs.	250 /hr	75.00
02/14/2021	LFQ	Work on memorandum regarding response to lawsuit (3.8); work on memorandum for meeting with New York State Attorney General showing this diocese's compliance with requirements of the Charter and Essential Norms (4.3); communications with Chancery representatives regarding same (4).	8.50 hrs.	250 /hr	2,125.00
02/14/2021	TMC	Confer with coverage counsel regarding the coverage position taken with respect to the claim against the Diocese.	0.20 hrs.	250 /hr	50.00
02/15/2021	TMC	Further work updating the policies and procedures, including a new whistleblower policy (.4); assisting with updates of other policies, including the code of conduct and conferring with Diocese (.3); working through the coverage issues with Diocese and our coverage counsel to respond to inquiries from the insurance carrier TNCRRG (.7); confer with Jones, Day regarding the coverage issues for response to the Office of Attorney General (.3).	1.70 hrs.	250 /hr	425.00
02/16/2021	TMC	Reviewing coverage position of one of the carriers and conferring	1.20 hrs.	250 /hr	300.00

with Diocese regarding our next steps (.2); reviewing statement of the insurance carrier with respect to Bishops Malone and Grosz (.3); discussion among team regarding the options available to challenge or to press forward with the coverage (.7).

02/17/2021	LFQ	Communications with Chancery representatives to obtain information necessary for presentation for the New York State Attorney General (.9); work on presentation (7.6).	8.50 hrs.	250 /hr	2,125.00
02/17/2021	TMC	Preparation for and participation in lengthy conference with team to provide historical perspective to certain inquiries that have been posed by the Office of Attorney General (1.3); follow-up calls with Diocese regarding additional data and information that we will need from the Diocese to comply with these requests and to provide Jones, Day with historical information on these topics (.8); confer with Lawlor F. Quinlan III regarding a presentation for the Attorney General responding to all of the issues and their various prayers for relief (1.6); further work updating our policies and procedures and drafting new procedures with respect to the DRB and the process of monitoring the priests would have been credibly accused of abuse (.8); providing input to our team for presentation (.7); email correspondence with Jones, Day regarding the new schedule for remand motion and our opposition (.8).	6.00 hrs.	250 /hr	1,500.00
02/18/2021	LFQ	Work on presentation for meeting with the Attorney General's Office (3.4); work on	5.60 hrs.	250 /hr	1,400.00

whistleblower policy to bring it up-to-date as requested by Attorney General (1.3); review old audit reports to explain process to Attorney General's office (.9).

02/18/2021	TMC	Preparation for and participation in conference call with the representatives of each NYS Diocese (.6); continue discussion with representatives at the Chancery regarding our obligation to report priests to the Congregation for the Doctrine of Faith and the nature and content of such a report (.8); confer with Lawlor F. Quinlan III regarding the status of the presentation for the Office of Attorney General (.4); email and conference call with Diocese regarding our efforts to provide historical data to the Jones, Day firm and reviewing updates to the policies and procedures (.9); lengthy conference call with attorney for other diocese to discuss the status of our investigations (1.1); report to clients (.3).	4.10 hrs.	250 /hr	1,025.00
02/19/2021	LFQ	Work on presentation to be made at request of Attorney General (2.6); conference call with other attorneys in preparation for presentation (1.6).	4.20 hrs.	250 /hr	1,050.00
02/19/2021	TMC	Confer with Jones, Day team in order to provide them with background and historical information for meeting with the Office of Attorney General (.8); reviewing and revising our presentation (.3); conferring with attorneys for other diocese regarding potentially relevant developments (.3); conferring with the attorney for another diocese regarding background information that might be relevant to our meeting with the	1.80 hrs.	250 /hr	450.00

002700	00040	Office of Attorney General (.4).	Invoice# 35397	Page 8
02/20/2021	LFQ	Prepare for presentation to New York State Attorney General to demonstrate compliance with Charter by addressing issues raised in complaint.	4.80 hrs.	250 /hr 1,200.00
02/20/2021	TMC	Reviewing several items in preparation for meeting with the Office of Attorney General, including updated policies, plan for monitoring priests, and DRB recommendations (.7); reviewing certain information for our response to the Attorney General (.7).	1.40 hrs.	250 /hr 350.00
02/21/2021	TMC	Confer with Lawlor F. Quinlan III regarding his detailed response to several issues raised by the Office of Attorney General (.3); review and revise presentation to the Office of Attorney General (.3).	0.60 hrs.	250 /hr 150.00
02/22/2021	RDW	Review of file regarding information for meeting with NYSOAG (1.5); emails regarding above (.3); review of draft presentation (.7); preparation for and conference with Terrence M. Connors and Lawlor F. Quinlan III (1.0).	3.50 hrs.	250 /hr 875.00
02/22/2021	TMC	Email correspondence from AAG Roque (.1); email correspondence from coverage counsel regarding the coverage opinion with respect to the Diocese and the Bishops (.2); confer with Jones Day team regarding the presentation to the Office of Attorney General (.3); forwarding our draft presentation to all parties (.1); receipt and review of the Remand Motion filed by the Attorney General (.4); email from Diocese regarding chart and review of same (.2); conferring with our team to provide historical data to	2.00 hrs.	250 /hr 500.00

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the Jones Day team for our pending meeting with the OAG (.7).

02/23/2021	LFQ	Telephone conferences regarding meeting with Attorney General's office (.5); work on revising presentation to be made to the Attorney General to document compliance with Charter (5.5); telephone conference with Chancery representatives regarding same (.6).	6.60 hrs.	250 /hr	1,650.00
02/23/2021	RDW	Preparation for and participate in call regarding status, discussions with NYSOAG, and related issues.	1.20 hrs.	250 /hr	300.00
02/23/2021	TMC	Email correspondence with Jones Day team regarding presentation (.7); email correspondence with Diocese regarding the meeting and attendees (.3); email correspondence with our Jones Day team regarding the presentation (.6); reviewing final draft of our procedures for receipt and processing of complaints as well as updates; confer with Lawlor F. Quinlan III (.4).	2.00 hrs.	250 /hr	500.00
02/24/2021	LFQ	Participate in conference with Chancery representatives regarding resolving issues with Attorney General's office (0.5); review documents pertaining to Attorney General's allegations in complaint and in recent letter (2.4); telephone conference with legal team in preparation for conference with Attorney General's office (1.2); work on presentation materials (1.9); communications with attorney for former Bishops (.2).	6.20 hrs.	250 /hr	1,550.00
02/24/2021	TMC	Email correspondence regarding review of the decision of Bankruptcy Court regarding	2.40 hrs.	250 /hr	600.00

retention application and email correspondence with attorney Donato (.3); conference with the joint defense team at the Jones Day firm regarding the information to present to the Attorney General (.6); conferring with key members of the Chancery and the Bishop's senior staff (.4); confer with Attorney Vacco who represents Bishops Malone and Grosz (.3); revising presentation with comments and input from members of our joint defense team (.8).

02/25/2021	LFQ	Work on presentation to be made to Office of Attorney General and prepare for meeting (4.0); participate in call regarding above(1.1); participate in conference with several Assistant Attorneys General (1.0); post-meeting conference (.6).	6.70 hrs.	250 /hr	1,675.00
02/25/2021	TMC	Preparation for and participation in conference call with representatives of each Dioceses (.8); reviewing brief on appeal from Rockville Center Diocese regarding issues with respect to the constitutionality of the statute and reviewing same (.7); report to the Diocese after our meeting with the Attorney General (.6).	4.50 hrs.	250 /hr	1,125.00
02/26/2021	LFQ	Report on responding to request of Attorney General.	4.80 hrs.	250 /hr	1,200.00
02/26/2021	TMC	Conference call with James Beardi, advisor to the Bishop, regarding open items relative to the Office of Attorney General investigation and to provide him historical information (.9); conference with Diocese executive team regarding the Office of Attorney General investigation and to provide settlement conference debriefing	3.40 hrs.	250 /hr	850.00

(1.1); reviewing our research with respect to the use of certain documents by the Office of Attorney General (.6); confer with our Jones, Day team regarding the next step in connection with these negotiations (.4); reviewing documentation from Diocese regarding further presentation to the Office of Attorney General (.3); reviewing draft letter to Attorney General responding to certain requests that were made by their settlement negotiation team (.3); researching monitoring plans for other Dioceses with respect to credibly accused priests (.7).

02/27/2021	LFQ	Review materials to be sent to Attorney General (1.8); work on responding to requests of Attorney General (1.7); communications with Chancery representatives and attorneys defending diocese regarding the same (1.1).	4.60 hrs.	250 /hr	1,150.00
02/27/2021	TMC	Reviewing research with respect to several defenses and sharing with our defense team (.6); reviewing the supporting documents supplied by Don Blowey for the 2020 audit (.4); conferring with Lawlor F. Quinlan III regarding the status of response to the prayers for relief (.3); review of draft letter to Attorney General and provide background and historical information (.3); research monitoring plan for other Dioceses and sharing with our team (.4).	2.00 hrs.	250 /hr	500.00
02/28/2021	LFQ	Prepare for and participate in call with attorneys defending diocese to assist in response to our request from Attorney General's office. (.8); work on response to	2.20 hrs.	250 /hr	550.00

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same (.9); conversations with
Chancery representatives (.5).

02/28/2021

TMC

Receiving and reviewing
standards for a program of
supervision and monitoring
created by other religious
congregations (.7); conferring
with Bishop Fisher and members
of his advisory team regarding
these topics (.8); reviewing the
requests made by the Office of
Attorney General with respect to
management letters and audit
work papers (.4); reviewing
these requests with Lawlor F.
Quinlan III and forwarding to
Jones, Day team (.5); reviewing
draft letter responding to the
Office of Attorney General and
receiving input from team
members (.6); receiving
information from Diocese
regarding management letters
and on-site audits (.3).

3.30 hrs.

250 /hr

825.00

Total fees for this matter

\$34,675.00

BILLING SUMMARY

Connors, Terrence M.	Partner	57.40 hrs	250 /hr	14,350.00
White, Randall D.	Partner	5.80 hrs	250 /hr	1,450.00
Quinlan, Lawlor F. III	Partner	75.50 hrs	250 /hr	18,875.00
TOTAL FEES		138.70 hrs		\$34,675.00

DISBURSEMENTS

02/28/2021	JAN STORAGE/LITIGATION SUPPORT	4,546.95
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Total disbursements for this matter

\$4,546.95

BILLING SUMMARY

TOTAL FEES	\$34,675.00
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TOTAL DISBURSEMENTS	\$4,546.95
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TOTAL CHARGES FOR THIS BILL	\$39,221.95
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CONNORS LLP
1000 Liberty Building
Buffalo, NY 14202
TAX ID NO. 16-1282035

April 16, 2021

DIOCESE OF BUFFALO
795 Main Street
Buffalo, NY 14203
CHILD VICTIMS ACT

Invoice# 35398 TMC
Our file# 002700 00046
Billing through 02/28/2021

PROFESSIONAL SERVICES

02/01/2021	LFQ	Work on document production.	4.10 hrs.	250 /hr	1,025.00
02/01/2021	RDW	Work on document production, including review of specific documents and privilege issues (3.6); preparation for and conferences regarding personnel file production and privilege issues (1.4); forward documents to BSK for production (.3); emails regarding stay issues (.5); preparation of responses to Blank Rome insurance inquiries (1.2).	8.00 hrs.	250 /hr	2,000.00
02/01/2021	CEO	Conducting privilege review of personnel file materials (1.1); meeting with Randall D. White and associate, Kelly E. Riley, to discuss privileged materials (.3).	1.40 hrs.	200 /hr	280.00
02/01/2021	KER	Continue privilege review of priest personnel files (3.0); meetings with associate, Caitlin E. O'Neil, and Randall D. White regarding upcoming production and potentially privileged document (0.5).	3.50 hrs.	200 /hr	700.00
02/01/2021	KKS	Review and analyze priest personnel files (1.6); complete priest personnel file production (1.2).	2.80 hrs.	100 /hr	280.00
02/02/2021	LFQ	Work on document production.	0.50 hrs.	250 /hr	125.00
02/02/2021	RDW	Review of new CVA lawsuits (.3); emails regarding above (.5); preparation for and conferences	7.60 hrs.	250 /hr	1,900.00

regarding document production, including personnel files (1.0); forward documents to BSK for production (.3); preparation of response to Blank Rome regarding insurance information (.7); work on document production (4.8).

02/02/2021	TMC	Reviewing the various productions made by other Dioceses to the Office of Attorney General and the Creditor's Committee in bankruptcy court to raise the appropriate privileges and to be consistent with other productions.	0.70 hrs.	250 /hr	175.00
02/02/2021	CEO	Conducting privilege review of personnel file materials.	2.20 hrs.	200 /hr	440.00
02/02/2021	KER	Continue privilege review of priest personnel files (2.4); meet with Randall D. White regarding potentially privileged documents (.8); confer with associate, Caitlin E. O'Neil, regarding further potentially privileged documents (.9).	4.10 hrs.	200 /hr	820.00
02/02/2021	KKS	Review and prepare next production of priest personnel files.	1.60 hrs.	100 /hr	160.00
02/03/2021	RDW	Review and preparation of personnel file documents regarding production (2.7); preparation of responses to insurance information inquiries of Blank Rome (2.8); emails regarding stay issues and appeals (4).	5.90 hrs.	250 /hr	1,475.00
02/04/2021	RDW	Preparation of responses to Blank Rome inquiries regarding insurance information (2.3); review and preparation of documents for production (2.9); participate in weekly CVA counsel call (.4); respond to Diocese insurance inquiry (.3); conference with Lawlor F.	7.20 hrs.	250 /hr	1,800.00

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Invoice# 35398

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Quinlan III regarding meeting with victim (.4); review of letter withdrawing sanctions motion (.4); emails with co-defense counsel regarding above (.5).

02/04/2021	TMC	Confer with counsel for the Diocese of Syracuse regarding the outcome of the severance and stay motions in Syracuse with respect to Lipsitz, Green clients.	0.30 hrs.	250 /hr	75.00
02/05/2021	LFQ	Work on document review.	1.10 hrs.	250 /hr	275.00
02/05/2021	RDW	Review of plaintiff's letter and emails with co-defense counsel regarding upcoming CVA calendar and status of motion for sanctions (1.2); communications with team regarding status of document production (1.5); emails with Terrence M. Connors and Lawlor F. Quinlan III regarding recent discovery developments and issues (.8).	3.50 hrs.	250 /hr	875.00
02/05/2021	TMC	Reviewing the status of the discovery issues as it pertains to the CVA litigation and the OAG investigation (.7); reviewing the response of the Diocese to the insurance carriers regarding certain discovery issues (.3); providing background information to Bishop Fisher regarding possible survivor meeting (.4); receipt of emergency request from the Diocese regarding a media inquiry with respect to priest and providing factual background for response (.3).	1.70 hrs.	250 /hr	425.00
02/05/2021	KER	Continue privilege review of priest personnel files.	1.10 hrs.	200 /hr	220.00
02/06/2021	RDW	Review of file and email regarding upcoming victim's meeting with Diocese (1.0); legal research regarding recent developments in CVA cases regarding discovery (1.0).	2.00 hrs.	250 /hr	500.00

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02/06/2021	TMC	Further research on the background for possible survivor meeting with Bishop Fisher.	0.70 hrs.	250 /hr	175.00
02/07/2021	RDW	Preparation of response to insurance information inquiries from Blank Rome.	0.40 hrs.	250 /hr	100.00
02/08/2021	RDW	Email from BSK regarding privilege issues and document production (.5); review of file and legal research regarding response (2.9); communications with Terrence M. Connors and Lawlor F. Quinlan III regarding above (.8); review of bankruptcy court filings (.7); emails and telephone conferences with co-defense counsel regarding sanctions motion, stay issues, and severance motion (1.7); conferences regarding priest personnel files and privilege and production issues (1.2).	7.80 hrs.	250 /hr	1,950.00
02/08/2021	TMC	Conferring with our team regarding the privilege issues that have arisen in connection with the production of documents (.4); reviewing extensive research on the privilege issues in order to advise the Bishop (.3); working on possible compromise as to insurance carriers (2).	0.90 hrs.	250 /hr	225.00
02/08/2021	KER	Continue privilege review of priest personnel files.	3.90 hrs.	200 /hr	780.00
02/08/2021	KKS	Review and analyze priest personnel files in preparation for production.	1.20 hrs.	100 /hr	120.00
02/09/2021	LFQ	Work on document review.	3.50 hrs.	250 /hr	875.00
02/09/2021	RDW	Review of documents, telephone conferences and emails regarding further personnel file production (1.1); emails regarding withdrawal of sanctions motion and related issues (1.7); review of file and emails with BSK regarding	5.50 hrs.	250 /hr	1,375.00

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		privilege issues (2.7).		
02/09/2021	TMC	Conference regarding preservation of privileges in the discovery process (.8); lengthy office conference with Bishop Fisher to provide him with historical background information regarding the CVA cases (.9).	1.70 hrs.	250 /hr 425.00
02/09/2021	KER	Continue privilege review of priest personnel files.	1.80 hrs.	200 /hr 360.00
02/10/2021	RDW	Review of file and preparation of response to Blank Rome inquiries regarding insurance information (1.7); telephone conference and emails with co-defense counsel regarding stay issues (1.5); work on document production (1.5).	4.70 hrs.	250 /hr 1,175.00
02/10/2021	KER	Continue privilege review of priest personnel files (2.0); telephone conference with Lawlor F. Quinlan III (.4).	2.40 hrs.	200 /hr 480.00
02/11/2021	RDW	Participate in weekly CVA counsel call (.4); emails and telephone conferences with co-defense counsel regarding stay issues and appeals (.8); preparation for and conference with team regarding document production, including personnel files and privilege issues (2.2).	3.40 hrs.	250 /hr 850.00
02/11/2021	KER	Continue privilege review of priest personnel files (.4); preparation for and meet with Randall D. White regarding potentially privileged documents (1.5).	1.90 hrs.	200 /hr 380.00
02/12/2021	LFQ	Work on document review.	0.80 hrs.	250 /hr 200.00
02/12/2021	RDW	Emails with co-defense counsel regarding appellate and stay issues (1.5); preparation for and telephone conferences with Blank Rome regarding insurance issues and status (.8); emails and conferences with Lawlor F.	4.00 hrs.	250 /hr 1,000.00

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Quinlan III and associate, Kelly E. Riley regarding personnel file production issues (1.3); telephone conference regarding CVA lawsuit (.4).

02/12/2021	KER	Continue privilege review of priest personnel files (2.6); telephone conference with Randall D. White regarding potentially privileged documents (.3).	2.90 hrs.	200 /hr	580.00
02/12/2021	KKS	Review and analyze priest personnel files in preparation for production.	1.10 hrs.	100 /hr	110.00
02/13/2021	RDW	Review of documents and relevant file background regarding personnel file production issues (.7); emails regarding above (.3); emails regarding CVA action (.3).	1.30 hrs.	250 /hr	325.00
02/13/2021	TMC	Confer with the Diocese regarding recent article in USA Today concerning priest and his interaction with Review Board and CVA litigation.	0.30 hrs.	250 /hr	75.00
02/14/2021	LFQ	Work on document production and review.	5.00 hrs.	250 /hr	1,250.00
02/15/2021	RDW	Conferences and emails regarding personnel file documents and privilege and production issues.	1.50 hrs.	250 /hr	375.00
02/15/2021	NAR	Legal research regarding joint defense agreement privilege issue for Randall D. White and Lawlor F. Quinlan III.	1.90 hrs.	200 /hr	380.00
02/15/2021	KER	Continue privilege review of priest personnel files (3.4); meet with Randall D. White regarding potentially privileged documents (.5).	3.90 hrs.	200 /hr	780.00
02/16/2021	LFQ	Work on document production.	4.60 hrs.	250 /hr	1,150.00
02/16/2021	RDW	Emails with BSK regarding stay and appellate issues (.8); work on document production, including conferences and emails	5.90 hrs.	250 /hr	1,475.00

with team regarding privilege and production issues (4.2); forward documents to BSK for production (.4); review of motion to compel CVA insurance information (.5).

02/16/2021	TMC	Reviewing Lipsitz, Green motion to avoid the bankruptcy stay and to litigate in State Supreme Court, and discussing historical perspective with team (.6); confer with our team regarding the issues that have arisen in connection with the production of documents and the assertion of privileges (.7).	1.30 hrs.	250 /hr	325.00
02/16/2021	KER	Continue privilege review of priest personnel files.	0.60 hrs.	200 /hr	120.00
02/16/2021	KKS	Prepare and review the next production for disclosure to counsel (1.5); confer with litigation vendor regarding same (.2); continue to prepare accused priests and personnel information as requested by Randall D. White (3.4); update production log to include today's production (.2).	5.30 hrs.	100 /hr	530.00
02/17/2021	LFQ	Conference call regarding request made by insurance carriers for disclosure of privileged documents.	0.90 hrs.	250 /hr	225.00
02/17/2021	RDW	Telephone conference with BSK, Terrence M. Connors, and Lawlor F. Quinlan III regarding personnel files and privilege issues (1.0); review of privilege log and preparation for telephone conference (2.2); review of documents and conferences regarding privilege and production issues (.4); emails forwarding personnel files to BSK for production (.8); review of recent CVA cases (.3); emails regarding stay issues (.4).	5.10 hrs.	250 /hr	1,275.00
02/17/2021	TMC	Conversation with our team	1.50 hrs.	250 /hr	375.00

regarding the privilege log, production to the Office of Attorney General, and the creditor's committee production and preparation of memorandum (.7); further work on insurer issues and stay and severance issues (.8).

02/17/2021	KER	Continue privilege review of priest personnel files.	0.90 hrs.	200 /hr	180.00
02/17/2021	KKS	Review and analyze priest personnel files in preparation for production.	1.60 hrs.	100 /hr	160.00
02/18/2021	RDW	Participate in CVA defense counsel call (.2); telephone conference with co-defense counsel regarding stay and other issues and proceedings in bankruptcy and Syracuse bankruptcy (1.0); preparation for and conference with paralegal, Krista K. Severino regarding personnel file production (2.2); review of file and follow up regarding recent telephone conference with BSK regarding healthcare privilege issues (2.5).	5.90 hrs.	250 /hr	1,475.00
02/18/2021	KKS	Prepare priest personnel board parish documents as requested by Randall D. White (.8); review and analyze various sources of data sets to continue to compile information as to priest personnel and CVA claimants (2.9).	3.70 hrs.	100 /hr	370.00
02/19/2021	RDW	Review of file and preparation of response to BSK inquiries for motion (3.2); emails with co-defense counsel regarding stay issues (.4); review of motion papers from Syracuse bankruptcy for relevance and application (1.3); emails regarding above (.7); review of files and documentation regarding privilege and discovery issues (1.9).	7.50 hrs.	250 /hr	1,875.00

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02/19/2021	KER	Continue privilege review of priest personnel files.	1.10 hrs.	200 /hr	220.00
02/20/2021	RDW	Review of relevant materials and preparation of detailed emails regarding motion for TRO/PI as to Lipsitz Greene cases.	2.50 hrs.	250 /hr	625.00
02/20/2021	TMC	Confer with BSK regarding their application for a temporary restraining order and preliminary injunction with respect to the Lipstiz, Green cases (.6); email correspondence and confer with our team regarding above and defense issues (1.3).	1.90 hrs.	250 /hr	475.00
02/21/2021	RDW	Continue emails regarding motion for TRO/PI as to Lipsitz Greene cases.	2.00 hrs.	250 /hr	500.00
02/21/2021	TMC	Reviewing the status of the Lipsitz, Green's efforts to avoid the bankruptcy and proceed against parishes and the response of BSK (.2) review Randall D. White's analysis on the legal issues and possible defenses(.3).	0.50 hrs.	250 /hr	125.00
02/22/2021	RDW	Review of file regarding response to victim claimant's inquiry (.8); preparation for and conference regarding personnel file production (1.7); review of file, legal research and analysis of health-related privilege issues (2.3).	4.80 hrs.	250 /hr	1,200.00
02/22/2021	TMC	Conferring with BSK regarding the assertion of privileges in connection with the discussions with the Creditor's Committee and insurance carriers.	0.30 hrs.	250 /hr	75.00
02/22/2021	KER	Continue privilege review of priest personnel files.	0.60 hrs.	200 /hr	120.00
02/23/2021	RDW	Review of and emails concerning new CVA case (.6); legal research and review of file regarding privilege issues (1.5).	2.10 hrs.	250 /hr	525.00
02/23/2021	KKS	Research regarding priests with unsubstantiated claims per the	2.20 hrs.	100 /hr	220.00

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		request of Randall D. White.		
02/24/2021	KER	Continue privilege review of priest personnel files.	0.60 hrs.	200 /hr 120.00
02/25/2021	RDW	Participate in CVA defense counsel call (.4); preparation of response to inquiry from victim claimant (.4); review of file and emails with co-defense counsel regarding CVA action, including scheduling orders (1.7); file review, legal research and analysis of privilege issues (2.0); work on further document production (1.0).	5.50 hrs.	250 /hr 1,375.00
02/25/2021	KER	Continue privilege review of priest personnel files.	0.70 hrs.	200 /hr 140.00
02/25/2021	KKS	Complete review of priest personnel board parish file documents as requested by Randall D. White.	1.10 hrs.	100 /hr 110.00
02/26/2021	LFQ	Work on document production.	1.10 hrs.	250 /hr 275.00
02/26/2021	RDW	Work on document production, including privilege and personnel file issues (2.8); preparation of reply to inquiry from claimant (.7); legal research and analysis regarding various privilege and discovery issues (3.2); forward documents to BSK for production (.5).	7.20 hrs.	250 /hr 1,800.00
02/26/2021	KER	Continue privilege review of priest personnel files (4.1); meet with Randall D. White regarding potentially privileged documents (.9); telephone conference with paralegal, Krista K. Severino, regarding priest files (.2).	5.20 hrs.	200 /hr 1,040.00
02/26/2021	KKS	Review and analyze various order priest personnel files in order to prepare litigation review platform per the request of associate, Kelly E. Riley (1.4); prepare priest personnel files in preparation for production (.9).	2.30 hrs.	100 /hr 230.00
02/27/2021	RDW	Review of file regarding status	1.00 hrs.	250 /hr 250.00

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of personnel file production (.4);
 legal research regarding
 privilege issues, including
 health-care privilege issues as to
 personnel files (.6).

02/27/2021	KER	Continue privilege review of priest personnel files.	2.90 hrs.	200 /hr	580.00
02/28/2021	RDW	Legal research regarding healthcare privilege issues (2.0); review of recent filings regarding stay issues (.7).	2.70 hrs.	250 /hr	675.00
02/28/2021	KER	Continue privilege review of priest personnel files.	1.10 hrs.	200 /hr	220.00

Total fees for this matter

\$48,330.00

BILLING SUMMARY

Connors, Terrence M.	Partner	11.80 hrs	250 /hr	2,950.00
White, Randall D.	Partner	115.00 hrs	250 /hr	28,750.00
Quinlan, Lawlor F. III	Partner	21.60 hrs	250 /hr	5,400.00
Romano, Nicholas A.	Associate	1.90 hrs	200 /hr	380.00
O'Neil, Caitlin E.	Associate	3.60 hrs	200 /hr	720.00
Riley, Kelly E	Associate	39.20 hrs	200 /hr	7,840.00
Severino, Krista K	Legal Assistant	22.90 hrs	100 /hr	2,290.00
TOTAL FEES		216.00 hrs		\$48,330.00

DISBURSEMENTS

02/28/2021	COMPUTER RESEARCH - WESTLAW	671.84
02/28/2021	PHOTOCOPIES	163.20
Total disbursements for this matter		\$835.04

BILLING SUMMARY

TOTAL FEES	\$48,330.00
TOTAL DISBURSEMENTS	\$835.04
TOTAL CHARGES FOR THIS BILL	\$49,165.04